

1 Clinton Thomas Gott
2 State Bar No. 9816
3 14 Hummingbird Circle
4 Henderson, NV 89014-2153
5 (702) 450-3322

6 Attorney Pro Se

RECEIVED & FILED

'09 SEP 22 AM 11:56

U.S. BANKRUPTCY COURT
MARY A. SCHOTT, CLERK

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

8 In Re:

11 Debtor

) CASE NO.: BK-S-09-20212-LRJ
) Chapter 7
)
) MOTION TO SELL RESIDENCE AND
) REQUEST DELAY FOR 45 DAYS
) OF FORECLOSURE SALE
)
) Hearing Date: September 30, 2009
) Hearing Time: 10:30 AM
)

16 COMES NOW Debtor Pro Se and hereby requests an Order allowing sale of his residence
17 commonly known as 14 Hummingbird Circle, Henderson, Nevada 89014. Attorney fees are not
18 requested. This Motion is based upon the pleadings and papers in file herein and the Memorandum
19 of Points and Authorities attached hereto.

21 

23 Clinton Thomas Gott
24 State Bar No. 9816
25 14 Hummingbird Circle
26 Henderson, NV 89014-2153
27 (702) 450-3322
28

1
2 MEMORANDUM OF POINTS AND AUTHORITIES

3
4 Debtor is in receipt of an offer to purchase his residence commonly known as 14
5 Hummingbird Circle, Henderson, Nevada 89014. The offer is a proposal for short sale and is not
6 sufficient to pay in full the creditor in first position, represented by Ocwen Loan Servicing, Inc.
7 There is no debtor in second position and no other liens on the property. Debtor believes that the
8 creditor in first position will approve shortly and will submit a payoff statement to title
9 commensurate with the above offer.

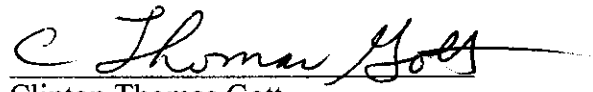
10 Therefore, Debtor respectfully submits that he has met the requirements of 11 U.S.C. §365
11 regarding the sale and requests that the Court allow the sale to proceed. Debtor does not request
12 payment of attorney fees for work in preparing this Motion.

13 Debtor is aware that Ocwen Loan Servicing, Inc., representing the Creditor in first position,
14 has requested that the Automatic Stay be lifted. Debtor does not oppose this but requests that the
15 Court stay any foreclosure for an additional 45 days so that the pending sale might close.

16 CONCLUSION

17 Based upon the foregoing, the Court should grant Debtor's requests.

18 Dated this 21st day of September, 2009.

19
20 
21 Clinton Thomas Gott
22 State Bar No. 9816
23 14 Hummingbird Circle
24 Henderson, NV 89014-2153
25 (702) 450-3322
26
27
28

CERTIFICATE OF FACSIMILE & MAILING

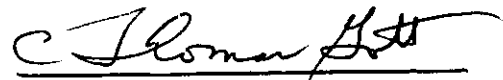
I hereby certify that I sent via facsimile and first class mail copies of the foregoing
MOTION TO SELL RESIDENCE AND REQUEST DELAY FOR 45 DAYS OF
FORECLOSURE SALE to the following:

Cindy Lee Stock Esq.
915 East Bonneville Ave.
Las Vegas NV 89101

William Leonard, Ch. 7 TTE
5030 Paradise Road #B-216
Las Vegas, NV 89119

U.S. Bankruptcy Court
333 Las Vegas Blvd S # B001
Las Vegas, NV 89101-7086

Date: 08/21/09



Clinton Thomas Gott
State Bar No. 9816
14 Hummingbird Circle
Henderson, NV 89014-2153
(702) 450-3322